



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

December 8, 2017

Jennifer Lilly
North America Regulatory Manager
Isagro USA
430 Davis Dr., Suite 230
Morrisville, NC 27560

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – to Revise
First Aid and Precautionary Statements, Add Batch Code Placeholder
Product Name: IR9804
EPA Registration Number: 80289-23
Application Date: 11/22/2017
OPP Decision Number: 536100

Dear Ms. Lilly:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false

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or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Gina Burnett by phone at (703) 605-0513 or via email at burnett.gina@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Andrew C. Bryceland". The signature is fluid and cursive, with the first name "Andrew" and last name "Bryceland" clearly legible.

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

IR9804

Soil Treatment Pesticide for Formulating Purposes Only

ACTIVE INGREDIENT :

Allyl isothiocyanate (CAS No. 57-06-7)*99.8%

OTHER INGREDIENTS :0.2%

TOTAL:100.0%

*This product contains 8.5 lbs. active ingredient per gallon.

ACCEPTED

12/08/2017

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under

EPA Reg. No. 80289-23

**KEEP OUT OF REACH OF CHILDREN
DANGER — PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label find someone to explain it to you in detail.)

FIRST AID	
IF IN EYES	<ul style="list-style-type: none">· Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.· Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.· Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none">· Take off contaminated clothing.· Rinse skin immediately with plenty of water for 15 to 20 minutes.· Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none">· Call a poison control center or doctor immediately for treatment advice.· Have person sip a glass of water if able to swallow.· Do not induce vomiting unless told to do so by a poison control center or doctor.· Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none">· Move person to fresh air.· If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.· Call a poison control center or doctor for further treatment advice.
NOTE TO PHYSICIAN: Because rapid absorption may occur through lungs if product is aspirated and cause systemic effects, the decision to induce vomiting or not should be made by a physician.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p style="text-align: center;">For Chemical Emergency Spill Leak Fire Exposure or Accident Call CHEMTREC Day or Night Domestic North America 800-424-9300 International 703-527-3887 (collect calls accepted)</p>	

EPA Registration No.: 80289-23

EPA Establishment No.: XXXXXX

NET CONTENTS:

[Batch No. – Batch numbers are laser printed onto product packaging]



Isagro USA, Inc.

430 Davis Drive, Suite 240, Morrisville, NC 27560

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER – PELIGRO. Corrosive. Causes irreversible eye damage and skin burns. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. May be fatal if swallowed, absorbed through skin, or inhaled. Do not get in eyes, on skin or on clothing. Do not breathe vapour. Wear protective clothing, chemical-resistant gloves, respiratory protection and protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying local sewage treatment plant authority. For guidance contact your local State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTION FOR USE

It is violation of Federal law to use this product in a manner inconsistent with its labelling. Read entire label. This product should be used only for formulation into a soil pesticide product for control of fungi, insects, nematodes and weeds.

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store unused product in original container only in cool, dry area out of reach of children and animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL for non-refillable containers: Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration. Do not burn, unless allowed by state and local ordinances.

CONTAINER DISPOSAL for rigid, refillable containers: Refillable container. Refill this container with IR9804 pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire label before using this product, including this Limitation of Warranty and Liability. If the terms are not acceptable, return the product at once unopened for a refund of the purchase price. This Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Directions for Use, subject to the inherent risks described below, when used in accordance with the Directions for Use under normal conditions. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ISAGRO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.